

Applicants respectfully traverse the Examiner's rejections to the extent that they are maintained.

Applicants have canceled claims 4-6 without prejudice, and Applicants respectfully submit that no new matter is being added by the above amendments, as the amendments are fully supported in the specification, drawings and claims as originally filed. Attached hereto is a copy of the currently pending claims including a marked-up version of the changes made to the claims by the current amendment. The attachment is captioned "Version with Markings to Show Changes Made."

First in the subject Office Action, the drawings were objected to by the Examiner, and claims 4-6 were rejected under 35 U.S.C. § 112, first paragraph, based upon Applicants' use of the term "gripping device" in the claims. While Applicants strenuously disagree with the Examiner's position, Applicants have nonetheless canceled these claims without prejudice in the interest of prosecutorial economy. Withdrawal of the drawing objections and §112 rejections is therefore respectfully requested.

Next in the subject Office Action, claims 1-13 were rejected as being unpatentable over Annis et al. in view of Platt et al.

First, with respect to claim 1, this claim recites a device for protecting components within an electronic system from radiated electromagnetic energy during concurrent maintenance. The device comprises a sheet of electromagnetic shielding material sized to overlay a portion of the electronic system, an opening formed in the sheet and sized for accessing the components within the electronic system, and a grounding member electrically coupled to the sheet and adapted to be coupled to a ground. The grounding member includes a wire terminated with a clip for removably coupling the grounding member to ground.

In rejecting claim 1, the Examiner has added Platt et al. to the previous rejection that relied on Annis et al. While Applicants are highly doubtful that one of ordinary skill in the art would look to the fish aquarium art to solve the particular problem addressed by claim 1, Applicants note that the Examiner has apparently ignored the language in claim

1, and the arguments previously raised in Applicants' previous Amendment and Response, regarding the concept of concurrent maintenance. Given that Platt et al. is directed to a fish aquarium, it is Applicants' position that Platt et al. does nothing to bolster the Examiner's previous rejection based upon Annis et al. with regard to concurrent maintenance. The Examiner's rejection of claim 1 is therefore still deficient for the reasons raised previously.

Specifically, as Applicants have noted before, Annis et al. does not disclose a device for protecting components within an electronic system from radiated electromagnetic energy during concurrent maintenance. The only maintenance operation described in connection with the Annis et al. device is that of replacing a processor chip. However, there is no disclosure or suggestion in the reference that such a replacement operation can occur while the device is active and in an operational state. Indeed, the Annis et al. device is intended for a more or less permanent installation, as evidenced by the placement of the device in an operational portable computer, as well as the use of a screw to ground the device in the computer.

Claim 1, in contrast recites a device for use in protecting components of an electronic system during concurrent maintenance, and the Examiner has failed to address this particular feature in this latest Office Action, or what specific disclosure in Annis et al. arguably teaches this feature. Absent any suggestion in Annis et al. or elsewhere in the prior art of the desirability of adapting the Annis et al. device to a concurrent maintenance environment, the Examiner's rejection cannot stand. Annis et al. certainly provides no such motivation. Moreover, given Platt et al.'s focus on a fish aquarium, the reference likewise does not overcome the fundamental deficiency in the Examiner's rejection.

Applicants therefore respectfully submit that claim 1 is non-obvious over Annis et al. and Platt et al. Reconsideration and allowance of claim 1, as well as of claims 2-3 and 7-8 which depend therefrom, are therefore respectfully requested.

Next, with respect to independent claim 9, this claim generally recites a method of performing concurrent maintenance on an electronic system, including shrouding at least

a portion of an enclosure of an electronic system with a sheet of shielding material while the electronic system is operating, grounding the sheet, and performing concurrent maintenance on the electronic system.

As described in Applicants' previous Amendment and Response, Annis et al. does not disclose performing concurrent maintenance on an electronic system while a sheet of shielding material is shrouded over at least a portion thereof. As described, for example, at page 1 of the application, concurrent maintenance refers to diagnosing problems and correcting failures in an electronic system while the system continues to operate in a normal manner. Given, in particular, the high availability requirements of many computer systems, system down time is highly undesirable in many situations. The claimed method improves on conventional concurrent maintenance operations by providing protection from radiated electromagnetic susceptibility through the use of a sheet of shielding material that shrouds at least a portion of an enclosure of an electronic system.

Annis et al. does not disclose or suggest a method of performing concurrent maintenance, and as such, the reference falls short of rendering claim 9 obvious. Annis et al. discloses, at the most, replacing a chip on a circuit board. However, it should be noted that such a replacement operation (which is described in connection with a processor chip) is not described as being a concurrent maintenance operation. In fact, given that the chip being replaced is a processor chip, it is highly unlikely that a laptop computer thus configured could continue to operate while a processor chip was being replaced. The most reasonable interpretation is that the computer would be shut off during the replacement operation.

Moreover, Annis et al. does not disclose shrouding at least a portion of an enclosure of an electronic system with a sheet of shielding material while the electronic system is operating, as is also recited in claim 9. It appears that the envelope disclosed in Annis et al. is installed during production, and prior to operation of the laptop computer.

Moreover, Annis et al. discloses placing a circuit board within an envelope. However, the enclosure of the laptop computer itself is not housed within the envelope.

Regardless of whether it is even possible to use the Annis et al. envelope in connection with concurrent maintenance as recited in claim 9, however, it is the Examiner's burden to establish that the prior art actually suggests using the Annis et al. envelope in connection with performing a concurrent maintenance operation. The Examiner has not done so in this case. The Examiner has thus failed to establish that Annis et al. suggests Applicants' claimed invention.

Furthermore, the addition of Platt et al. to the rejection fails to provide the required suggestion in the art to modify Annis et al. for use in connection with performing concurrent maintenance operations. Platt et al., which is directed to a fish aquarium, cannot even arguably be read to suggest anything with regard to concurrent maintenance of an electronic system. Thus, Platt et al. adds nothing to the Examiner's rejection of claim 9.

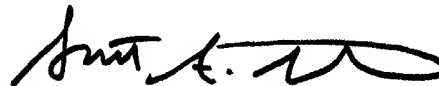
Accordingly, Applicants respectfully submit that claim 9 is non-obvious over Annis et al. and Platt et al. Reconsideration and allowance of claim 9, as well as of claims 10-13, are therefore respectfully requested.

In summary, Applicants respectfully submit that all pending claims are novel and non-obvious over the prior art of record. Reconsideration and allowance of all pending claims are therefore respectfully requested. If the Examiner has any questions regarding the foregoing, or which might otherwise further this case onto allowance, the Examiner may contact the undersigned at (513) 241-2324. Moreover, if any other charges or credits

are necessary to complete this communication, please apply them to Deposit Account 23-3000.

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Date

Respectfully submitted,



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